

# Appendix A-Fiscal Year 2014 Program Summary

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## I. Introduction

During the 2014 fiscal year, EPA Region 6 piloted SharePoint as a way to conduct this annual review. The pilot involved conducting monthly calls with ODEQ staff reporting status updates on the various components reviewed during a traditional end of year (EOY) review. Additional work is needed by EPA Region 6 to help include ODEQ staff in the SharePoint site, where staff can independently report status updates. While the pilot was not a complete success, the information provided in this summary will constitute the ODEQ EOY review for 2014.

Title 40 of the Code of Federal Regulations (40 CFR) Part 142.17 (a)(1) states: At least annually the Administrator shall review, with respect to each State determined to have primary enforcement responsibility, the compliance of the State with the requirements set forth in 40 CFR part 142, subpart B, and the approved State primacy program. This report summarizes the required primacy end-of-year (EOY) review of the Oklahoma Department of Environmental Quality (ODEQ) Public Water Supply Supervision (PWSS) Program by the Environmental Protection Agency (EPA) Region 6 (R6) Source Water Protection Branch, Drinking Water Section.

The ODEQ program elements, which were previously adopted by the State and approved by EPA to meet 40 CFR 142.10 primacy requirements, are examined as well as State activities to meet new primacy requirements and initiatives under the 1996 Amendments to the Safe Drinking Water Act (SDWA). ODEQ's achievements, activities, and shortfalls are highlighted throughout the report.

## II. Summary

Starting in October 2014, each monthly call held with the state has included an agenda item for End of Year reporting. Table 1 shows the topics covered during each conference call.

*Table 1-EOY Agenda Topics*

<b>Month of Call</b>	<b>Topic Covered</b>
October	Operator Certification & Grants
December	Capacity Development
January	Source Water Protection, Water Security, & Sanitary Surveys
February	Rule Management
March	Laboratory Certification & Capacity
April	Legal & Tribal
May	Enforcement (Engineering)

During the monthly call the responsible staff were to provide a recap of the year's activities. In addition staff were requested to bring up challenges and expectations for the upcoming year.

Listed by topic, below, are the summary notes from each monthly report-out.

#### October 2014-Operator Certification and PWSS/SRF Grants

##### Operator Certification Update-Chris Wisniewski

- Due to state statute modifications over 7,500 system operations must be renewed including some 1,105 licenses
- Currently, the program is fully staffed and the renewal process is running smoothly.
- Work is continuing on technical advancements including online renewal process and the creation of an online application process.
  - Online Application process is pending state action with a 3rd party state contract
- Contracting with Rose State College's Oklahoma Environmental Learning Center to revise study guides

##### SRF/PWSS Update-Patty Thompson

- Department fully staffed
- Funding granted for 7 projects and 20 subsidies issued on consolidation projects
- DEQ continues to manage funds and avoid ULOs
- Ashley noted that DEQ's QMP is set to expire on 11/6/14
  - Ashley & Patty will work to contact the appropriate staff
- Once drafted by Ashley, Nichole will share the SRF/PWSS Summary sheet (traditionally provided and discussed during the EOY meeting)
  - Summary sheet will also be posted on the SharePoint site

#### December 2014-Capacity Development

##### Brandon Bowman

##### Past Year Recap

- Revision of Cap Dev assessment form
  - From a three page check sheet to a seven page assessment
  - Added a technical review section, which was missing
  - Added emphasis on sustainability to all sections

Developed templates for financial, managerial, SOP, personnel policies

- Emphasis on on-site, one-on-one financial, managerial, and technical assistance during assessment - 16 completed in the past year.
- Active participation in AWOP program
  - Helped with assessment and assistance with Cap Dev issues in the AWOP CPE process
  - Participated in weeklong CPE at Nowata
- Conducted outreach across the state
  - Titled Enhancing Public Water Supply Compliance and Performance in a Changing World
  - Held at five locations around the state
  - Day-long seminar focused on water reuse, funding, capacity development, and a technical advice and assistance section that was tailored to each region of the state.

#### Upcoming Year

- Water Loss Auditing pilot program
    - Pilot Project - will be conducting 40 water loss audits across the state in the upcoming year
    - Results from the audits will be used to develop action plans for each system to address water loss and enhance sustainability
  - Will be making a push for conducting rate studies – looking into securing training
- Continued on-site, one-on-one financial, managerial, and technical assistance

#### January 2015-Source Water Protection, Water Security, & Sanitary Surveys

Robert Huber

- 2569 inspections (San Surveys) completed, an increase from last year's numbers
  - Surveys identified 535 critical violations,
    - 76 of those were still unaddressed at the follow-up inspection
  - ESLC staff is having better contact/communication with PWSs
    - Working on the "art of communication" during face to face encounters
  - Work continues on refining the automated progress for inspections
    - Transition on how one manages electronic resources and data
    - Upgrading tablets in the coming year
  - Staff will be involved in the Water loss pilot
    - 10 ECLS Level 4 Env Specialists have completed a 40 hour training on conducting Water Loss Audits
    - The program looks to also conduct a simplified water loss audit to all PWSs

- Technical Assistance continues to be a high priority for the group
- ECLS handled over 204 complaints for PWS with taste/odor and other issues
  - 144 technical reports were also logged
  - Fully documenting this number is sometimes a little hard (various staff might take a phone call and not properly log the assistances provided)
- Management will focus on increasing institution knowledge with in house training
  - A request to EPA has been made to provide Sanitary Survey training for new ECLS and DE staff

## February 2015-SDW Rule Management

### Erin Lovelady-CCR

Working on the following items

- Sending out violations letters
- Developed and sending out pamphlets on using the CCR iwriter, with detailed instructions (receiving great feedback on it working)
- Sending out reminder notifications for the July 1 deadline
- Updating the web page with new information
- 84 PWSs have returned to compliance within the last few weeks
- Expect to see an increase in submissions for the 2014 CCR
- Checking CCR script for DBP data

iWriter CCR status (Shirley checked on and provide an email with the status of the CCR iwriter)

CCR iWriter will be rebuilt and moved to an EPA controlled server (currently on contractor server) expect a change in early 2015

### Jamie-PWS Inventory & SOC's

- Increased focus on SOC's with monitoring waiver packets
  - Working with DEs on small group of large systems and then rolling out state wide SOC monitoring and waivers

### Sheri McGuire-Inorganics, Volatile Organics, & Radiochemical Rules

- Rads
  - Data flow improved, Georgia Tech method has helped with quicker data flow
  - Monitoring histories reviewed and several PWSs placed on reduced monitoring
  - Monitoring schedules have been correctly applied

- Inorganics
  - New in-house email method for notification from the state lab for Nitrite/Nitrate samples > MCL
    - Working to establish this process with outside labs
    - Method allows for quicker PN on these systems
  - US Gypsum PWS to be offer variance (This would be the 1st variance issued by ODEQ)
    - EPA needs to check on the status of ODEQ's regulatory authority to issue a variance
- VOCs
  - PWS with incorrect piping material, causing VOCs in the DS, has completed all line replacements

#### Emily Hoskin-Disinfection Byproducts Rule

- DBP training completed for ECLS and operators thought out the state
- 99% of PWSs have CMP in place
- Now issuing NOV's for a couple of hundred monitoring violations
- Ongoing work to clean up data and issue consent orders

#### Jordan Canary- Surface Water Treatment Rules

- RTCed and closed past LT1 NOV's and PN's
- Sent Reminder letters for the remaining LT1 violations
- Updated FANL's to NOT be creating false monitoring violations
  - Mismatch on FANL's was creating over 250 violations per month, now down to 50 a month
- January 5 started new MOR submission for PWS > 1000 (approx. 520)
  - 70-80% submitted
    - MOR's with low chlorine residual are referred to DE's and high residuals are referred to Emily for potential DBP issues
- LT2-additional log removal credit being documented on MOR's
- Sending out notifications for round 2 source sampling
  - Adding sites as needed, reviewing schedules and updating FANL's to meet requirements

#### Jennifer Alig- GWR & Boil Advisories

- GWR
  - Sent out education information based on differences with primacy transition from EPA
  - Great success with outreach "roadshow" met with PWS's, labs, other DEQ staff, and OML
  - Issued violations and sent out notifications

- Still working out Wholesaler/Purchase PWS notification process and violations
- Learning curve with the SDWIS GWR\BridgeTool and which schedules to migrate
- Obstacles with rule, include
  - Issues with labs not coding the samples correctly,
  - Triggered samples makes it hard for systems who have never had a TC+ in the past
- Boil Advisories
  - Experienced a great increase in TC and EC + boil advisory (Highest #s seen since 2007)
    - Working to help PWSs get wells into shape, great process in place with ODEQ staff
  - Increase in Boil Advisories might be result from legislation to regulate NC systems who "serve" food, these systems were originally Non-Public systems

#### Bryan Niblett Total Coliform Rule & Lead and Copper Rule

- Pb/Cu
  - In the final phase of CC sampling
    - Working with PWSs to understand the new sampling schedules
  - Updating information and forms posted on the ODEQ web site
- TCR
  - New assignment
    - Meeting weekly to learn RTCR
    - Working on form development (including paper and electronic versions) for the various assessments and sampling plans
    - RTCR primacy packet extension submitted

#### March 2015-Laboratory Certification & Capacity

Chris Armstrong

- Unanticipated funding has helped to purchase new equipment
  - Aging equipment within the drinking water section of the lab
- At the same time, there has been a 10% cut in state appropriations to the lab
  - Working the short fall within the Customer Service offered to PWSs
- Lab Cert-Cincinnati needs to know the following
  - Discussions between TNI and EPA on training and conducting DW audit
    - Discussion focus on how to conduct audits

- Audit each method or technique
- Certification for officers is critical
- Offer more schools on the officer certification (CO school)
- Moving forward with TNI accreditation
  - Sending 1 staff member for the following Rads, MicroBio, and Chem
  - If funding available will send Certification Officer
- EPA Certification School is a MUST
- Want EPA to increase Certification Officer training
- Capacity -Overall good 25 commercial and Public DW labs in state and out of state
  - Anticipate a challenge with educating the smaller systems and private labs on the RTCR changes with regards to MCL violations
- Seeking LT2 crypto & giardia certification
- LCSMS methodology jump and challenge for capacity
- Harmful Algal Blooms (2011-alga toxin) Monitoring for Public Water Supply identify thresholds on cyanotoxins
  - When there is a report of blooms, sampling occurs based on the algal species found in finished water monitoring
- Development of Cellular concentration vs toxin database
  - Strong desire to continue with the program/database to help as the problem continues to be seen in the State with possible increases in the future
- OK has been great about moving forward within the National Optimizing Treatment technique and funding research

#### April 2015-General Counsel

- Finalize a DBP2 consent order template
- Water loss audit funding moving forward going out to bid
- 518 Clean Water Act tribal jurisdiction -challenge with no reservation lands in OK
- Potawatomi Nation and the ownership of Rural #3 continues to be an area of concern
- Riverside Indian School status whose inventory are they on? Answer-ODEQ's inventory
- Create a table on SharePoint showing tribal inventories for both EPA and ODEQ
- Still need to address Tribes operating PWS that serves Non-Tribal consumers
- ODEQ will request a discussion with General Council Tina Arnold and Christine Crocker



## May 2015-Enforcement

### PWS Enforcement (DEs)

#### Dawn Hoggard

- City of Clinton overhauling sources due to drought in western OK
- Recent rainfall has allowed the system to start up surface water plant
- PWS will be adding GW sources, however these sources will need treatment
- They will also be restructuring sources used in the area, including using sand wells along the Washita river.
- In general this is a big long term project the city is entering into
- Clinton selected for EPA HQ Drought Resiliency Project

#### Candy Thompson

- Taylor Ferry Marina, privately owned in Wagoner county
- Minor PWS turned NC with turbidity and Cl<sub>2</sub> problems
- Small slow sand filter
- Site visit showed a great deal of deficiencies
  - Common walls, high turbidity, chlorine levels low, etc
- Order with penalty issued
- PWS now opting to purchase water from Rural Water District

#### Dave Mercer-Regionalization

- Nobel Co # 1 pulling source water from a soil conservation district
- Extremely high DBP results
- Membrane used in addition to existing treatment
- PWS lacked knowledge regarding membrane operations-fouled membranes
- PWS grant SRF \$\$
- Now connected to Perry Co # 3
- CO from 2005 to be closed in the upcoming weeks

#### Jesi Lay

- McAlester
- Turbidity issues even after rehab on filters
- Faced TT violations
- Technical assistance identified cross connection

#### Shane Hacker

- Heavy Rainfall impacting enforcement rolls & the number of calls

- SW systems lakes are full
- GW system wells are under water
- Tishomingo working on full plant rehab

Shawn Wiegmann (hired within the last 6 months)

- Working with unpermitted wells
  - One is actually being used
  - One thought their well was permitted
- Inspected 2 PWS on consent order
- Participated in recent CPEs

Mark Fogleman( hired < 6 months ago)

- Responding to boil advisories
- Conducted a couple of Level 2 assessments
  - Finding solutions for these PWSs
- Arcadia using SRF \$ to connect with the city of Edmond

Highlights from Past DEs

Steven Hoffman-Red Dirt Bar NE OK

- Conducting level 2 assessment
- Taking samples, during a 30 minute sampling event
- Something in the well broke and red dirt starting coming out

Zach Paden-Hugo Community

- PWS had difficulties running the plant
  - Turbidity issues
  - Triggered CPE
  - Lengthy list of corrects needed
- Management company for the PWS has send in a self-disclosure document highlighting issues